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**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:	Case No.: BK-S-06-10725 LBR
USA COMMERCIAL MORTGAGE COMPANY,	Case No.: BK-S-06-10726 LBR
Debtor.	Case No.: BK-S-06-10727 LBR

In re:	Case No.: BK-S-06-10728 LBR
USA CAPITAL REALTY ADVISORS, LLC,	Case No.: BK-S-06-10729 LBR
Debtor.	Chapter 11

In re:	Jointly Administered Under Case No. BK-S-06-10725 LBR
USA CAPITAL DIVERSIFIED TRUST DEED FUND, LLC,	
Debtor.	

In re:	EX PARTE MOTION FOR AN ORDER AUTHORIZING SUBMISSION UNDER SEAL OF CONFIDENTIALITY OF MOTION FOR PROTECTIVE ORDER, MEMORANDUM IN SUPPORT THEREOF AND DECLARATION OF SARAH O'CONNELL
USA CAPITAL FIRST TRUST DEED FUND, LLC,	
Debtor.	
In re:	
USA SECURITIES, LLC,	
Debtor.	

Affects:
All Debtors
USA Commercial Mortgage Company
USA Securities, LLC
USA Capital Realty Advisors, LLC
USA Capital Diversified Trust Deed Fund, LLC
USA Capital First Trust Deed Fund, LLC

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2 USA Investment Partners, LLC and Joseph D. Milanowski, through their counsel of
3 counsel of record hereby move this court *ex parte* for an Order Authorizing Submission
4 Under Seal of Confidentiality of Motion for Protective Order, Memorandum in Support
5 thereof and Declaration of Sarah O'Connell. This Motion is made upon the following
6 grounds:
7

8 1. The Motion for Protective Order, Memorandum and Declaration of Sarah
9 O'Connell set forth confidential factual information regarding pending criminal investigations
10 and subpoenas requesting confidential information pertaining USA Investment Partners, LLC
11 and Joseph D. Milanowski.
12

13 2. Movants seek to prevent this information from being acquired by or disclose to
14 potentially hostile parties that may adversely use the information to cause any possible waiver
15 of Movants' 5th Amendment rights or may cause adverse parties to use the information to the
16 detriment of U.S. Investment Partners, LLC, Joseph D. Milanowski and the bankruptcy
17 estates.
18

19 3. Upon request, a redacted copy of the Memorandum will be provided to parties in
20 interest with a Motion for Protective Order on conditions that its contents be kept confidential.
21

22 4. The Movants request the Motion for the Order authorizing the submission of the
23 Motion, Memorandum and Declaration of Sarah O'Connell be under seal of confidentiality.

24 WHEREFORE, movants request an Order Authorizing Submission of the
25 Memorandum and Declaration of Sarah O'Connell under seal of confidentiality.
26
27
28

1 DATED this __ day of November, 2006.

2 **WOODBURY & KESLER, P.C.**

3
4 /s/ Russell S. Walker

5 Russell S. Walker, Utah Bar No. 3363
6 Elizabeth R. Loveridge, Utah Bar No. 6025
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12 and

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